

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION

This document relates to:

*County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.*

Case No. 1:18-OP-45090

*The County of Cuyahoga v. Purdue Pharma  
L.P., et al.*

Case No. 17-OP-45004

MDL NO. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DEFENDANTS' EMERGENCY MOTION FOR RELIEF  
RELATED TO EXPERT DEPOSITIONS**

For the reasons set forth in the accompanying Memorandum of Law, Defendants respectfully request that the Court order that: (1) certain experts (as identified in Appendix A to the accompanying Memorandum of Law) be made available for at least two days of deposition testimony;<sup>1</sup> (2) each Defendant Family is allowed to question each of Plaintiffs' experts on issues specific to it (in addition to a lead questioner per Defendant Group); and (3) Plaintiffs must produce all reliance materials and data at least 14 days before each expert is deposed.

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<sup>1</sup> Defendants reserve their rights to seek leave to depose experts for additional time.

Dated: April 8, 2019

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 8th day of April 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF System.

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